

MEGTEC Systems
830 Prosper Road
P.O. Box 5030
De Pere, WI 54115-5030

920/336-5715



October 7, 2004

Wisconsin Department of Natural Resources
Green Tier Program
Attn: Thomas L. Eggert, Esq.
101 S. Webster St.
PO Box 7921
Madison, WI 54307

Re: Green Tier Application

Dear Mr. Eggert:

This will confirm that MEGTEC Systems, located at 830 Prosper Road, DePere, WI is, by this submission, applying for participation in the Wisconsin Department of Natural Resources' Green Tier Program as a Tier 2 Participant. Enclosed please find the Application, a copy of our Environmental Management Policy, a copy of our Environmental Management Program certification, and documentation of our four (4) current Objectives & Targets.

If there are any questions or additional information needed, you may contact me at (920) 337-1574 or at ccampbell@megtec.com. Thank you.

Sincerely,

Christopher J. Campbell, CSP
EHS / Security Manager

Enclosures

cc: Randy Matty, WI DNR, w/encl.
Wm. A. Smith, w/encl.
Brian D. Geurts, w/encl.

Notice: Collection of this information is authorized under s. 299.83 Wis. Stats. Participation in Green Tier and completion of this form are voluntary. Personal information collected on this form, including such data as your name, address, phone number, etc., will be used in the implementation of Green Tier and will be made broadly available under the Green Tier program. Information will also be made accessible to requesters under Wisconsin's Public Records Law (ss. 19.32 - 19.39, Wis. Stats.). Applications must be considered complete by the Department of Natural Resources in order to be processed. For application instructions, see "Green Tier Application Instructions," publication number CO-501.

This application is a: Tier 2 Participation Request

I. Applicant Information (add additional forms for each entity that is part of the applicant group)

Person or Entity Name: Christopher J. Campbell	Title: EHS / Security Manager		
Street Address: 830 Prosper Road	City: DePere	State: WI	ZIP Code: 54115
Telephone Number: 920-336-5715	Fax Number: 920-337-1436	E-Mail Address: ccampbell@megtec.com	

II. Facility Information (add additional forms for each facility or activity that is to be included in Green Tier)

Facility Name:	County:		
Street Address: 830 Prosper Road	City: DePere	State: WI	ZIP Code: 54115
Mailing Address: PO Box 5030	City: DePere	State: WI	ZIP Code: 54115-5030
Please identify all Facility Identification numbers (FID #) that apply to the covered facility or activity: 405007240			

III. Scope of Green Tier Participation

Materials in support of this section should be labeled Attachment 1.

Please describe the discrete activities to be covered in the program, if the application is not for whole-facility participation in Green Tier.

Application is for whole-facility participation in Green Tier, no Attachment needed.

IV. Enforcement Record

Materials in support of this section should be labeled Attachment 2. Eligibility requirements are established in s. 299.83 (3) and (5), Wis. Stats.

Has the applicant, managing operators of the applicant or any person with 25% or more ownership interest in the applicant:

- No** a. Had a judgment of conviction entered against them for a criminal violation of an environmental regulation involving a covered facility or activity?
If yes, please provide the date(s) of conviction and the nature of the violation(s).
Applicants convicted of a criminal violation within 60 months before the date of application for Tier 1 and 120 months for Tier 2 that resulted in substantial harm to public health or the environment or that presented an imminent threat to public health or the environment are ineligible for the program.
- No** b. Had a civil judgment entered against them for a violation of an environmental regulation involving a covered facility or activity?
If yes, please provide the date(s) of the judgment and the nature of the violation(s).
Applicants with a civil judgment entered against them within 36 months before the date of application for Tier 1 and 60 months for Tier 2 that resulted in substantial harm to public health or the environment are ineligible for the program, unless the applicant requests a waiver of enforcement record requirements.
- No** c. Been referred to the Department of Justice for enforcement of an environmental regulation involving a covered facility or activity?
If yes, please provide the date(s) of referral and the nature of the violation(s).
Applicants referred to the Department of Justice within 24 months before the date of application for Tier 1 and Tier 2 are ineligible for the program, unless the applicant requests a waiver of enforcement record requirements.
- No** d. Been issued an environmental citation by the Department of Natural Resources involving a covered facility or activity?
If yes, please provide the date(s) of the citation and the nature of the violation(s).
Applicants issued an environmental citation within 24 months before the date of application for Tier 1 and Tier 2 are ineligible for the program, unless the applicant requests a waiver of enforcement record requirements.

Are you requesting a waiver from enforcement record requirements?

No If yes, please attach a justification. Waivers may be granted in exceptional circumstances.

V. Environmental Performance

Please provide information on the following Tier 1 or Tier 2 activities. *Materials in support of this section should be labeled Attachment 3.* For definitions of environmental performance and superior environmental performance, refer to Application Instructions.

Tier 1

- Baseline environmental performance report that addresses each covered facility or activity to be included in Green Tier. Within this report establish a baseline date against which future progress may be measured.
- Current environmental performance (measured against the baseline).
- Future plans for enhancing the environment.

Tier 2

- Describe the applicants' record of superior environmental performance and the measures that it proposes to take to maintain and improve its superior environmental performance.

See Attachment 3 for a description of both our record of superior environmental performance and the actions that we propose to take to maintain and improve our superior environmental performance.

VI. Environmental Management System (EMS)

Materials in support of this section should be labeled Attachment 4.

Yes Do you have an EMS certified to the International Organization for Standardization standard 14001?

See Attachment 4 and accompanying documents

If yes, please attach a copy of the following to this application:

- Third Party Certification
- Environmental Policy Statement
- Scope Statement
- Documented Objectives and Targets for the Facility or Activity

VII. Tier 1 Applicant Statement of Commitments

I commit to:

a. implement, within one year of the date of this application, an EMS that is third party certified to the International Organization for Standardization or is functionally equivalent as determined by the Department of Natural Resources for each covered facility or activity under Green Tier.

b. conduct annual EMS audits, with every 3rd audit performed by an outside environmental auditor approved by the Department of Natural Resources.

c. submit to the Department of Natural Resources an annual report on the EMS audit that is in compliance with s.299.83 (6m) (a) and progress towards meeting objectives related to improved environmental performance for aspects regulated under chs. 29 to 31,160, and 280 to 299, unregulated environmental aspects, or voluntary actions to restore, enhance, or preserve natural resources.

I commit to the above statements and certify that all information provided is true and correct under penalty of law.

Signature of Applicant	Date Signed
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VIII. Tier 2 Applicant Statement of Commitments

I commit to:

a. conduct annual EMS audits performed by an outside environmental auditor approved by the Department of Natural Resources.

b. conduct or have another person conduct an annual audit of compliance with environmental requirements that are applicable to the covered facilities and activities eligible under the program.

c. submit to the Department of Natural Resources an annual report on the EMS audit and the environmental requirements compliance audit and reporting the results in compliance with 299.83 (6m) a. Wis. Stats.

I commit to the above statements and certify that all information provided is true and correct under penalty of law.

Signature of Applicant	Date Signed
/s/ Christopher J. Campbell	10-7-04

IX. For Department Use Only

Date Received	Initials of Reviewer	Status	Date Returned to Applicant for Additional Information	Date Approved	Date Denied
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Attachment 3: MEGTEC Systems has consciously worked to reduce hazardous waste by taking three significant steps. The result of these steps is that MEGTEC Systems has improved its status from (as defined by EPA) a Large Quantity Generator to a Small Quantity Generator. The three steps include:

- 1) Elimination of an entire hazardous waste stream of aerosol cans. Formerly, aerosol cans were disposed into collection drums by any user when finished with the task at hand. The drums were then disposed as hazardous waste. The new procedure requires the cans to be restocked if there is any remaining useable paint, and punctured (with residual paint collected as hazardous waste and aerosol propellant collected in a charcoal filter) only after they are completely spent. This has eliminated in excess of 40 55-gallon drums of aerosol can hazardous waste a year. As an added bonus, the punctured cans are crushed and deposited with MEGTEC Systems' scrap metal recycler for use in steel production.
- 2) Modified the procedure for cleaning paint guns with the resultant reduction by 75% of the remaining primary hazardous waste stream. Formerly, the painters would clean the guns after each coat. This would involve a discharge of solvent through the paint guns into a collection pail until the solvent flow had no appearance of paint solid. In the new procedure, painters switch from primer coat to finish coat at the completion of the primer coat, allowing the finish coat to "chase" the primer through the guns and onto the product, then discharge only enough solvent into the collection pails to remove the bulk of the paint solids; the remainder of the solvent is returned to the solvent supply container for reuse. The solvent, laden with paint solids, is distilled to reuse the solvent, and the still bottoms are the hazardous waste. This has resulted in a reduction from approximately 600 pounds of hazardous waste generated a week to approximately 600 pounds of hazardous waste generated a month.
- 3) Virtual elimination of a waste stream of customer coatings. Formerly, the Pilot Coater Laboratory operation would accept remaining unused coatings from customers after a trial run. The coatings were of use to the customer, but not to MEGTEC Systems, and hence would become hazardous (if solvent-based) or non-hazardous (if water-based) waste. By strengthening the wording in the contracts for use of the Pilot Coater Laboratory, MEGTEC Systems was able to encourage virtually all customers to remove their remaining unused after the Coater trials, thereby saving unnecessary waste generation. While the reduction in this category is difficult to measure, due to widely variable waste generation resulting from widely variable solvent-based coating use in the Pilot Coater, it is easy to see that the reduction is real.
- 4) Attachment 3 Addendum: MEGTEC Systems will commit to the following goals to maintain our superior environmental performance.
 - 1) Remain a Small Quantity Generator.
 - 2) Work towards Conditionally Exempt Small Quantity Generator status by substituting a less environmentally polluting cleaning solution for paint operations.
 - 3) Work with our contractors and suppliers to develop environmentally preferable solutions to current products or practices.
 - 4) Complete and implement our Portable Generator Operational Control Procedure by the end of 2005.
 - 5) Communicate to our top 300 suppliers to encourage their development of Environmental Management Systems and to promote our participation in Wisconsin Green Tier by the end of 2006.
 - 6) Capture results of the Energy Conservation Green Belt project and implement appropriate and feasible transformations.
 - 7) Share environmental improvement results achieved through 6 Sigma and other Operational Excellence projects.
 - 8) Share opportunities or improved environmental performance that are identified as a part of our Environmental Management System processes.

Attachment 4: Please see attached copy of Third Party Certification, Environmental Policy Statement (including Scope), and Objectives and Targets

Attachment 5: Please see our description of stakeholders and their addresses below.

- 1) Our neighbors in the industrial park. These would include adjoining businesses on Enterprise Drive (West and South of our facility), Prosper Road (North and East of our facility), and County Highway PP (East of our facility). These businesses include: Protective Flooring & Linings, C A Lawton, Bay Engineered Castings, B&J Machine, Remis Battery Systems, Power & Control Products Company, Drew's Roofing, Valley Cabinet, and Don Van Straten Trucking. Their stake in our system includes airborne emissions, and waste that may be discharged onsite or in transport and migrates to their premises.

Protective Flooring & Linings
2009 Enterprise Drive
DePere, WI 54115

C A Lawton
1950 Enterprise Drive
DePere, WI 54115

Bay Engineered Castings
1900 Enterprise Drive
DePere, WI 54115

B&J Machine
801 Prosper Road
DePere, WI 54115

Remis Battery Systems
809 Prosper Road
DePere, WI 54115

Power & Control Products Company
825 Prosper Road
DePere, WI 54115

Drew's Roofing
815 Prosper Road
DePere, WI 54115

Valley Cabinet
845 Prosper Road
DePere, WI 54115

Don Van Straten Trucking
850 Prosper Road
DePere, WI 54115

- 2) The DePere Wastewater Treatment Facility, primary contact Mr. Robert Kennedy. One part of our process includes cleaning of metal components and assemblies, another part includes plasma cutting of metal with a water bed to prevent overcutting into the floor, and the water residue from these is treated then discharged to the Wastewater Treatment Facility. That Facility has an interest in our properly operating our treatment system as improper treatment can result in toxic concentrations of metals deposited to the Treatment Works.

City of DePere
Wastewater Treatment Facility
315 Leonard Street
DePere, WI 54115

Primary contact: Mr. Robert Kennedy

- 3) Our waste haulers and recycling vendors. Currently, we dispose of used paper and cardboard, scrap wood (pallets and crates), and refuse through Waste Management Northeast, primary contact last I knew was Darrell Ruh. We recycle steel and other metals through B&B Metals, primary contact Mr. Robert Burrows. Both have an interest in our preparing our waste streams for shipment in accordance with regulations and in not contaminating the waste streams with incompatible materials. We are in the process of changing our hazardous waste vendor, and have not yet offered them a shipment, so I would not include them as a stakeholder at this time.

Waste Management Northeast
1861 E. Allouez Avenue
Green Bay, WI 54307
Primary contact (last I knew): Mr. Darrell Ruh

B&B Metals
14520 Pioneer Road
Newton, WI 53063
Primary contact: Mr. Robert Burrows

ISO 14001

Certificate of Registration

conferred upon

METEC Systems, Inc.

De Pere, Wisconsin, USA

Having been examined in detail for conformance to the requirements of ISO 14001, First Edition, 1996-09-01, and having been determined by Advanced Waste Management Systems, Incorporated, the Registrar, to be in conformance with all provisions of this international standard at the aforementioned location, the Environmental Management System of the facility is hereby registered to ISO 14001. The registration shall remain in effect until November 2, 2004, providing the organization maintains its Environmental Management System in accordance with the specifications of ISO 14001 and the requirements of the Registrar. Advanced Waste Management Systems is an "ANSI-RAB EMS Accredited Registrar."

In witness whereof this Certificate of Registration is granted and the Mark of Registration and our signatures are hereunto affixed

Attested to this 2nd day of November, 2001.

Richard A. Ellis

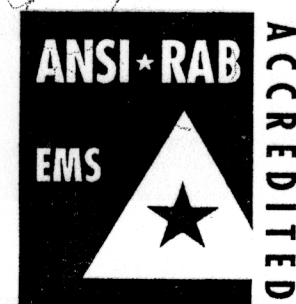
Richard A. Ellis, Ph.D.
Arbiter of Registration

James N. Mullican

James N. Mullican, P.E.
President



Registration Number 00111 ®



Objective & Target

Activity: All Other Priority Aspects		None	Issue Date: 9-7-01
1.	Objective: Maintain current levels of environmental protection and regulatory compliance.		
2.	Target is <u> X </u> Quantifiable <u> </u> Risk Reduction		
	a. Continue to control other regulated aspects (those not covered by another Objective & Target) to the standards required by regulation or MEGTEC Systems policy or procedure, in order to maintain or improve existing waste generation levels.		
3.	Action Plan a. Submit annual environmental reports on time. Provide or arrange employee EMS training on schedule. Perform other activities per Legal Requirements procedure. b. Review operations and activities for new aspects at Annual Environmental Review Meeting.	Person Responsible a. CHC, EMC, Department Managers b. CHC	Target / Completion a. Ongoing b. Done

Objective & Target

Activity: Outplaced Jobs – Paint Contractor		A5b1	Issue Date: 8-26-03
1.	Review Quality Sandblasting's past environmental impacts based on consultant sampling events and regulatory inspections. Determine whether and how Quality Sandblasting intends to make improvements to its processes' environmental impacts.		
2.	Target is <u> X </u> Quantifiable <u> </u> Risk Reduction		
3.	Action Plan	Person Responsible	Completion Date
	a. Review Quality Sandblasting's records of past environmental inspections and violations.	a. CHC	a. 11-30-04
	b. Request a look forward document from Quality Sandblasting relating its intent to improve its environmental procedures.	b. EMC	b. 12-31-04

Objective & Target

Activity: Scrap Parts Redirection		C13b	Issue Date: 12-18-03
1.	Explore Alternate Destinations for Useable but Not Needed Parts, Components, and Scrap Material.		
2.	Target is <u> X </u> Quantifiable <u> </u> Risk Reduction		
3.	Action Plan	Person Responsible	Completion Date
	a. Experiment with alternate avenues for possible sale or donation of useable items and scrapped stock material. Note, on 10-7-04 SEA advised that initial results were not very positive.	a. SEA/CHC	a. 2-29-04
	b. Plan future action, based on results of experiment.	b. EMC	b. 12-31-04

Objective & Target

Activity: Purchasing - Generators		A5d	Issue Date: 8-26-03
1.	Review use of Portable Generators in MEGTEC Systems post-manufacturing testing processes, and develop an Operational Control Procedure to address the potential environmental impacts.		
2.	Target is <u> X </u> Quantifiable <u> </u> Risk Reduction		
3.	Action Plan	Person Responsible	Completion Date
	a. Review the process to obtain a portable generator, including provisions for correcting conditions that may pose a negative environmental impact. Develop a suitable draft OCP.	a. PWM	a. completed
	b. Review draft OCP and approve an acceptable version.	b. EMC	b. 12-31-04